

MA

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEANETTE Y. SAMS)
_____))
_____))
_____))
(Name of the plaintiff or plaintiffs))
v.)
CITY OF CHICAGO POLICE DEPT.)
_____))
BARBARA HEMMERLING)
_____))
(Name of the defendant or defendants))

CIVIL ACTION

NO. 13 CV 7625

FILED

MAR 12 2014

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

AMENDED COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.
2. The plaintiff is JEANETTE Y. SAMS of the
county of COOK in the state of ILLINOIS.
3. The defendant is CITY OF CHICAGO POLICE DEPARTMENT, whose
street address is 3510 South Michigan Avenue,
(city) Chicago (county) Cook (state) Illinois (ZIP) 60652
(Defendant's telephone number) (312) - 745-6100
4. The plaintiff sought employment or was employed by the defendant at (street address)
3510 South Michigan Avenue (city) Chicago
(county) Cook (state) Illinois (ZIP code) 60652

5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☒ was hired and is still employed by the defendant.
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,
(month) MARCH, (day) 12, (year) 2012.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

(a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☐ *has not* filed a charge or charges against the defendant ☒ *has* asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(i) ☒ the United States Equal Employment Opportunity Commission, on or about
(month) MARCH (day) 12 (year) 2012.

(ii) ☐ the Illinois Department of Human Rights, on or about
(month) _____ (day) _____ (year) _____.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ YES. ☐ NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)_____ (day)_____ (year)_____

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)_____
(day)_____ (year)_____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ YES ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☐ the United States Equal Employment Opportunity Commission has not issued
a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a
Notice of Right to Sue, which was received by the plaintiff on
(month) JULY (day) 27 (year) 2013 a copy of which
Notice is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) ☐ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

- (c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)

10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).

11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.

12. The defendant [*check only those that apply*]

- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☐ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): Placed on a Leave despite a medical letter stating ability to work therefore no medical coverage nor income as a form of punishment.

Defendant knowingly placed plaintiff at risk for further medical problems with
no income for daily needed life sustaining medicine, and the strong possibility
of a major stroke causing death.

13. The facts supporting the plaintiff's claim of discrimination are as follows:

SEE ATTACHED

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
[check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
(b) ☐ Direct the defendant to re-employ the plaintiff.
(c) ☐ Direct the defendant to promote the plaintiff.
(d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
(e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
(f) ☒ Direct the defendant to (specify): PAY ALL BACK PAY AND MAKE
WHOLE , FULL MEDICAL PENSION COVERAGE OR BENEFITS

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

(Plaintiff's name)

JEANETTE Y. SAMS

(Plaintiff's street address)

7747 South Paxton Avenue

(City) Chicago (State) Illinois (ZIP) 60652

(Plaintiff's telephone number) (312) -213-8315

Date: 24 October 2013

PARAGRAPH 13

RACE

In March 2011, I requested a transfer to the Medical Section Unit, within the CPD because I have the Education and skills to work within that unit. There were openings in that Unit at the time. Barbara Hemmerling refused to allow me to work in this Unit and told me she didn't want me there. She then proceeded to hire two white females who had less experience than I did. As a result of not being allowed to work in the Medical Unit, I was forced on leave and I did not receive any income or medical insurance while on leave.

DISABILITY

A failure to Accommodate and the discrimination issue. I am disabled in that I have suffered several strokes (CVA) and as a result I am permanently disabled. I am unable to work or live in a stressful environment, without a strong possibility of another stroke. I have weakness on the left side, leg and arm and other things. I requested an accommodation in that I work in the medical unit because there I would not work in a stressful environment and the medical unit was a less chaotic place with a one to one ratio. I was denied the accommodation despite my skills and training, and the fact that there were openings in the unit. As a result I was fraudulently placed on a personal leave then a medical leave where I received no pay and no medical coverage by Barbara Hemmerling.

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

440-2012-02738

Illinois Department of Human Rights

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Jeanette Y. Sams

Home Phone (Incl. Area Code)

(773) 731-6948

Date of Birth

08-15-1958

Street Address

City, State and ZIP Code

7747 S. Paxton Ave., Chicago, IL 60649

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

CHICAGO POLICE DEPARTMENT

No Employees, Members

500 or More

Phone No. (Include Area Code)

(312) 745-5300

Street Address

City, State and ZIP Code

3510 S. Michigan Ave., Chicago, IL 60652

Name

No Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☐ RETALIATION ☐ AGE ☒ DISABILITY ☐ GENETIC INFORMATION
☐ OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE
Earliest Latest**03-12-2012**☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s))

I began my employment with Respondent on or around January 30, 1991. I was employed as a Police Officer. During my employment, Respondent was aware of my disability. I requested a reasonable accommodation and it was not provided. In addition, I was subjected to different terms and conditions of employment, including, but not limited to, being placed on annual leave status without pay. On or around March 12, 2012, I was not allowed to return to work.

I believe I have been discriminated because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended. I also believe I have been discriminated against because of my disability, in violation of the Americans with Disabilities Act of 1990, as amended.

MAR 23 2012

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Mar 23, 2012

Date



Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

EEOC Form 161 (11/09)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Jeanette Y. Sams**
7747 S. Paxton Ave.
Chicago, IL 60649

From: **Chicago District Office**
500 West Madison St
Suite 2000
Chicago, IL 60661



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

440-2012-02738

Jerry Zhang,
Investigator

(312) 869-8029**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

John P. Rowe
John P. Rowe,
District Director

3/24/2013
 (Date Mailed)

Enclosures(s)

cc:

Stephen Patton, Esq.
Chief Assist.
CITY OF CHICAGO DEPT OF LAW
30 North LaSalle St.
Room 1040
Chicago, IL 60602

CITY OF CHICAGO



Dear City of Chicago Employee;

The Comptroller's Office has received the enclosed Court Ordered garnishment today. According to Federal and State regulations, as your employer, we must deduct the amount cited in the Court Order beginning with your next paycheck. These deductions can only be terminated when you reach the goal amount on the Order or, when we received a release from the Creditor.

If you would like to make alternate arrangements for payment and not have this money deducted from your paycheck or reduce the amount deducted from your paycheck each pay period, please contact the Creditor on the order and speak with one of their representatives.

Respectfully,

**Garnishment Division
Office of the City Comptroller
33 N. LaSalle Street – Suite 700
Chicago, Illinois 60602
312-744-4463**

(Rev. 6/30/08) CCM 0638

Citation to Discover Assets to Third Party (Wages)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
FIRST MUNICIPAL DISTRICT**DISCOVER BANK**

Plaintiff(s),

vs.

JEANETTE Y SAMS

Defendant(s),

Court Date: 11/01/2013No. 09 M2 3782

Defendant's Social Security Number

And

CITY OF CHICAGO

Third Party Respondent.

CITATION TO DISCOVER ASSETS TO THIRD PARTY (WAGES)

To: CITY OF CHICAGO, C/O COMPTROLLER'S OFFICE 33 N LASALLE ST, STE. 700 CHICAGO CHICAGO, IL 60602

YOU ARE REQUIRED to appear or file your answer to this Citation on the form appearing on the reverse side or attached on November 1, 2013 before 9:30 a.m. in Courtroom 1401 located at Cook County Circuit Co 50 W. Washington, Chicago, Illinois. Judgment was entered on 10/08/10 in favor of Plaintiff DISCOVER BANK and against Defendant(s) JEANETTE Y SAMS in this Court under the above case in the sum of \$9,041.91. There is now due, less credit and off-set, the sum of \$11,532.75. Further sums may become due as cost and interest acc.

YOU ARE TO INFORM the court of property and wages and other money you may hold belonging to Defendant JEANETTE Y SAMS or to which s/he may be entitled or which may thereafter be acquired by or become due to him or her.

YOU ARE PROHIBITED from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from execution or garnishment belonging to Defendant or to which s/he may be entitled or which may thereafter be acquired by or become due to him or her, and from paying over or otherwise disposing of any money not exempt which are due or to become due to Defendant, up to double the amount of the balance due, until further order of court or termination of the proceeding, whichever occurs first.

THE COURT MAY PUNISH YOU if you violate the restraining provision of this citation as and for contempt, and the court may enter judgment against you for either the amount of the unpaid portion of the judgment and costs allowable under this section or the amount of the value of the property transferred, whichever is less. 735 ILCS 5/2-1402(f)(1). Failure to answer this Citation may result in entry of judgment against you for the balance due. 735 ILCS 5/2-1402(c)(1). 735 ILCS 5/12-807(a).

WARNING: YOUR FAILURE TO APPEAR OR FILE AN ANSWER IN COURT AS HEREIN DIRECTED MAY CAUSE YOU TO BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO THE CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT IN THE COUNTY JAIL.

CERTIFICATE BY JUDGMENT CREDITOR OR ATTORNEY FOR JUDGMENT CREDITOR

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the above information regarding the amount of the judgment, the date of the judgment, or its revival date, the balance due thereon, the name of the Court and the number of the case is true and correct.

Atty. No. 44826

Name: ZWICKER & ASSOCIATES, P.C.

Signature:



A Law Firm Engaged in Debt Collection
Address: 7366 N. LINCOLN AVE. SUITE 102
City/State/Zip: LINCOLNWOOD, IL 60712
Telephone: (847)677-7410 FAX: (847)677-7415

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

314253

(6/30/08)

CCM 0124 B

ANSWER OF THIRD PARTY RESPONDENT CITATION
This first section must be filled out by the judgment creditor.Citation/Respondent: JP MORGAN CHASE BANK
Defendant's Name: JEANETTE SAMSCourt Date: JAN 08 2014
Case No.: 13-M1-138643

Plaintiff: Cavalry SPV II, LLC

Judgment Balance: \$3,567.95
This is a Citation: Freeze up to double the Judgment Balance**INTERROGATORIES**1. On the date of service of the citation, did you have in your possession, custody or control any personal property or monies belonging to the judgment debtor? ☐ Yes ☐ No
IF THE ANSWER IS YES GO TO NEXT QUESTION. IF NO GO TO INSTRUCTIONS.2. Is this an IRA account? Or have all of the deposits made during the past 90 days been electronically deposited and identified as exempt Social Security, Unemployment Compensation, Public Assistance, Veteran's Benefits, Pension or Retirement or by a source drawing from any other statutory exemptions? ☐ Yes ☐ No
IF THE ANSWER IS YES GO TO NEXT QUESTION. IF NO GO TO INSTRUCTIONS.3. Is/Are the account(s)' current balance equal to or less than the total of the exempt deposits? ☐ Yes ☐ No
IF YOU ANSWERED YES TO ALL 3 QUESTIONS AND FUNDS IN THE ACCOUNT(S) ARE EXEMPT, DO NOT FREEZE THE FUNDS AND GO TO INSTRUCTIONS BELOW.

	ACCOUNT BALANCE	AMOUNT WITHHELD
4.		
A) Savings Account	\$ _____	\$ _____
B) Check/MMA/Now Account	\$ _____	\$ _____
C) Certificate of Deposit	\$ _____	\$ _____
D) Trust Account/Other	\$ _____	\$ _____
(Describe) _____		
E) Safety Deposit <input type="checkbox"/> Yes <input type="checkbox"/> No		
F) Land Trust No. _____		\$ _____
G) Less Right of Offset for Loans		\$ _____
TOTAL AMOUNT FROZEN:		\$ _____

5. List all electronic deposits into account(s) and their source(s) except deposits:

Account Number	Source	Monthly Amount
_____	_____	\$ _____
_____	_____	\$ _____
_____	_____	\$ _____

6. List all joint account holders or adverse claimants:

Name	Name	Name
_____	_____	_____
Address	Address	Address
_____	_____	_____
Account Type: <input type="checkbox"/> Checking <input type="checkbox"/> CD Savings	Account Type: <input type="checkbox"/> Checking <input type="checkbox"/> CD Savings	Account Type: <input type="checkbox"/> Checking <input type="checkbox"/> CD Savings
<input type="checkbox"/> Account Number	<input type="checkbox"/> Account Number	<input type="checkbox"/> Account Number

INSTRUCTIONS

- (1.) Fill out and sign the certification below.
- (2.) This Answer must be filed at least three (3) days before the court date to assure timely processing.
- (3.) Fax or mail a copy of this Answer to (i) the Court, (ii) Plaintiff's attorney and (iii) Judgment Debtor. If filing in the First Municipal District, you may fax to (312) 603-6522 or mail to the Clerk of the Court, Richard J. Daley Center, 50 W. Washington Street, Room 602, Chicago, IL 60602. You should also fax it to Plaintiff's attorney at (847) 241-1220
- (4.) You will receive a copy of a Court Order by fax or mail instructing you how to proceed and where to send any withheld funds.

CERTIFICATION

Under the penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct and that I have mailed this Answer to Defendant(s).

Date: _____

Print Agent Name: _____

Respondent Name: _____

Signature of Agent: _____

Address: _____

Telephone: _____ FAX: _____

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Clerk of the Court

Seal of Court (Over)

Employer/Agent: CITY OF CHICAGOCourt Date: 11/01/2013Defendant's Name: JEANETTE Y SAMS

S.S. No. _____

Case No.: 09 M2 3782Defendant's Address: 7747 S PAXTON AVE CHICAGO, IL 60649

CERTIFICATION OF MAILING BY JUDGMENT CREDITOR OR ATTORNEY FOR JUDGMENT CREDITOR
Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), I certify that I mailed by regular first-class mail a copy of the citation to Defendant at the address shown above on 10/11/12

Signature: _____

Name: Aaron Weiss**INTERROGATORIES/ANSWER TO THIRD PARTY CITATION TO DISCOVER ASSETS (WAGES)**Do you pay any money to the Defendant listed above? ☒ Yes ☐ No If terminated, date _____

IF YOUR ANSWER IS "NO," GO TO "RESPONDENT CERTIFICATION"

Of the funds paid to the debtor, are any of those funds:

☒ Subject to prior court ordered deduction (including child/spouse support) Case Number, State, Country 09M1124917 Cook

Disability? Retirement? Otherwise exempt? (Describe _____)

CALCULATION TO DETERMINE AMOUNT OF WITHHOLDING

(Note: If income varies, withholding must be recalculated for every pay period.)

Do you pay debtor: Every week Every two weeks ☒ Semi-monthly Monthly Other(A) Gross wages per paycheck minus mandatory contributions to pensions or retirement plan (A) 3142.4(B) 15 % of (A) = (B) 471.37(C) Enter total FICA, State Tax, Federal Tax and Medicare Emp on (C) 818.61(D) Subtract (C) from (A) = Leave of Absence Nov 2011 (D) 2323.85

(E) If debtor is paid every week, enter \$371.25

If debtor is paid every two weeks, enter \$742.50

If debtor is paid semi-monthly, enter \$804.37

If debtor is paid monthly, enter \$1,608.75 (E) 804.3

If other, multiply 45 times state minimum wage (currently \$8.25) times number of weeks in pay period

(F) Subtract (E) from (D) (Enclose a negative number in parentheses, e.g., (\$50.00)) (F) 1519.48

IF LINE "F" IS ZERO OR A NEGATIVE NUMBER, DO NOT WITHHOLD ANY WAGES. GO TO

"INSTRUCTIONS" BELOW. (G) 471.37(G) Enter the Lesser of Line (B) or (F) (G) 471.37(H) Enter Child Support or other Court Ordered Deduction (H) 471.37(I) Subtract (H) from (G) (Enclose a negative number in parentheses, e.g., (\$50.00)) (I) 0

LINE "I" MUST BE WITHHELD AS OF THE DATE OF SERVICE AND HELD UNTIL FURTHER COURT

ORDER. IF LINE "I" IS ZERO OR A NEGATIVE NUMBER, DO NOT WITHHOLD ANY WAGES. GO TO

"INSTRUCTIONS" BELOW. (J) 0(J) Subtract Employer's Statutory Fee (2% of line "I"). See 735 ILCS 5/12-814. (J) 0(K) Amount to be applied to Judgment (K) 0**INSTRUCTIONS**

1. Complete the Interrogatories/Answer to the Third Party Citation to Discover Assets (Wages).
2. Complete and sign the certification at the bottom of this page.
3. Fax or mail a copy of this Answer to the Court and Plaintiff's attorney and give a copy to the Defendant. If filing in the First Municipal District, either fax it to (312) 603-6522 or mail to the Clerk of Court, Richard J. Daley Center, 50 West Washington Street, Room 602, Chicago, IL 60602. To assure timely processing, the Answer should be received at least three days before the Court Date.
4. You will receive a copy by fax or mail of a Court Order instructing you how to proceed and where to send any withheld funds.

RESPONDENT CERTIFICATION

Under the penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the statements set forth in this instrument are true and correct and that I have either mailed or hand delivered a copy of this completed Interrogatories/Answer to the Defendant.

Date: 10/16/13Signature of Employer/Agent: Michael J. Jacob

Print full name clearly: _____

A. _____

City of Chicago-Garnishment Unit

T. 33 N. LaSalle St. - Rm 700

F. Chicago, IL 60602

312-744-4463/Phone-312-744-8407/Fax

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS



The Shindler Law Firm

1990 E Algonquin Rd. Suite 180
Schaumburg, IL 60173
Phone: (847) 537-1000
Fax: (847) 537-0959

01/03/2014

JEANETTE SAMS
7747 S PAXTON AVE
CHICAGO, IL 60649-4113

Re: Cavalry SPV II, LLC, -VS.- JEANETTE SAMS
Our File #: 314253
Case #: 13-M1-138643

Enclosed please find a Third Party Citation which was filed in court.

***THIS IS AN ATTEMPT TO COLLECT DEBT AND ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE***

314253

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICT

Cavalry SPV II, LLC,
Plaintiff,

v.

JEANETTE SAMS

Defendant,

JP MORGAN CHASE BANK
Third Party Respondent,

No. 13-M1-138643

** THIS IS AN ATTEMPT TO COLLECT A
DEBT AND ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE**

RETURN DATE: JAN 08 2014 at 9:30 a.m.

Judgment Debtor's last known:

Name: JEANETTE SAMS
Address: 7747 S PAXTON AVE
City: CHICAGO, IL 60649-4113
Phone:

A judgment in favor of Cavalry SPV II, LLC and against JEANETTE SAMS was entered on 08/26/2013 in the amount of \$3,219.04 plus costs and \$3,567.95 remains unsatisfied

Name and address of Attorney for Judgment Creditor:

Attorney No.: 27053
The Shindler Law Firm
1990 E, Algonquin Rd. Ste. 180
Schaumburg, IL 60173
(847) 537-1000

Name of person receiving citation: JP MORGAN CHASE BANK

NOTICE: The court has issued a citation against the person named above. The citation directs that person to appear in court to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to the judgment debtor or in which the judgment debtor has an interest. The citation was issued on the basis of a judgment against the judgment debtor in favor of the judgment creditor in the amount stated above. On or after the court date stated above, the court may compel the application of any discovered income or assets toward payment on the judgment.

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. THE JUDGMENT DEBTOR HAS THE RIGHT TO ASSERT STATUTORY EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR WHICH MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE:

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

314253

Citation to Discover Assets to a Third Party

(Rev. 6/30/08) CCM 0124 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT, FIRST DISTRICTCavalry SPV II, LLC,
Plaintiff,

v.

JEANETTE SAMS

Defendant,

JP MORGAN CHASE BANK

Third Party Respondent,

No. 13-M1-138643

** THIS IS AN ATTEMPT TO COLLECT A
DEBT AND ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE**
RETURN DATE: JAN 08 2014**CITATION TO DISCOVER ASSETS TO A THIRD PARTY**

TO: JP MORGAN CHASE BANK, C/O CT. CORPORATION SYSTEMS, 208 S. LASALLE, SUITE 814, CHICAGO, IL 60404.

YOU ARE REQUIRED to either file your answer to this Citation on the form attached hereto or appear on JAN 08 2014, before 9:30 A.M. in Courtroom 1401 of the Richard J. Daley Center, 50 W. Washington St., Chicago, IL 60602. Judgment was entered on 08/26/2013 in favor of Plaintiff, Cavalry SPV II, LLC and against, Defendant, JEANETTE SAMS in this court under case number 13-M1-138643 in the sum of \$3,219.04 plus costs. There is now due, less credits and off-set, sum of \$3567.95 (Judgment Balance). Further sums may become due as costs and interest accrues.

Your answer will inform the Court as to property you may hold belonging to JEANETTE SAMS (Judgment Debtor).

YOU ARE PROHIBITED from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from the enforcement of a judgment, a deduction order or garnishment, property belonging to the judgment debtor or to which s/he may be entitled or which may thereafter be acquired by or become due to him or her, and from paying over or otherwise disposing of any moneys not so exempt, which are due to the judgment debtor. This prohibition shall remain in effect until further order of court or termination of the proceeding. You are not required to withhold the payment of any monies beyond double the amount of the total sum due the judgment creditor.

If the account consists solely of funds that can be identified as exempt under federal or state law, you are PROHIBITED from FREEZING THE ACCOUNT and YOU MUST RESPOND that the account consists solely of exempt funds. Deposited funds that are exempt under federal and state law include Social Security, SSI, veteran's benefits, Railroad Retirement benefits, public assistance benefits, unemployment compensation benefits and/or circuit breaker property tax relief benefits.

WARNING: YOUR FAILURE TO COMPLY WITH THE CITATION PROCEEDING MAY RESULT IN A JUDGMENT BEING ENTERED AGAINST YOU FOR THE UNSATISFIED AMOUNT IF THIS JUDGMENT. 735 ILCS 5/2-1402(f) (1).**WARNING: IF YOU FAIL TO APPEAR IN COURT OR FILE YOUR ANSWER AS DIRECTED, YOU MAY BE ARRESTED AND BROUGHT BEFORE THE COURT TO ANSWER TO A CHARGE OF CONTEMPT OF COURT, WHICH MAY BE PUNISHABLE BY IMPRISONMENT IN COUNTY JAIL.****CERTIFICATION BY JUDGMENT OR ATTORNEY FOR JUDGMENT CREDITOR**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that the above information regarding the Judgment Amount of \$3,219.04 plus costs, Balance Due Creditor: \$3,567.95, dated: 08/26/2013, Name of Court & Case No.: Circuit Court of Cook County, 13-M1-138643 is true and correct.

Attorney for Plaintiff

The Shindler Law Firm

Keith S. Shindler ARDC 6202882

Michael R. Joyce ARDC 6298460

Antonio C. Capozzi ARDC 6291445

Anthony Frank ARDC 6305951

1990 E. Algonquin Rd. Ste. 180

Schaumburg, IL 60173

Telephone: (847) 537-1000; FAX: (847) 241-1220

Signature: _____

ATTORNEY FOR PLAINTIFF

Clerk of Court _____

Seal of Court

DOROTHY BROWN DEC 04 2013
DOROTHY BROWN CLERK COURT OF COOK COUNTY, ILLINOIS

* 0 3 1 4 2 5 3 T P C 1 4 - *

- (1) Under Illinois or federal law, the exemptions of personal property owned by the debtor include the debtor's equity interest, not to exceed \$4,000.00 in value, in any personal property as chosen by the debtor, including money in a bank account.
- (2) Social Security and SSI benefits;
- (3) Public assistance benefits;
- (4) Unemployment compensation benefits;
- (5) Worker's compensation benefits;
- (6) Veteran's benefits;
- (7) Circuit breaker property tax relief benefits;
- (8) The debtor's equity interest, not to exceed \$2,400 in value, in any one motor vehicle;
- (9) The debtor's equity interest not to exceed \$1,500 in value, in any implements professional books, or tools of the trade of the debtor;
- (10) Under Illinois law every person is entitled to an estate in homestead, when it is owned and occupied as a residence, to the extent in value of \$15,000, which homestead is exempt from judgment;
- (11) Under Illinois law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 15% of gross weekly wages or (ii) the amount by which disposable earnings for a week exceed the total of 45 times the federal minimum hourly wage;
- (12) Under federal law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 25% of disposable earnings for a week or (ii) the amount by which disposable earnings exceed 30 times the federal minimum hourly wage;
- (13) Pension and retirement benefits (including IRA accounts) and refunds may be claimed as exempt under Illinois Law.

The judgment debtor may have other possible exemptions under the law.

THE JUDGMENT DEBTOR HAS THE RIGHT AT THE CITATION HEARING TO DECLARE EXEMPT CERTAIN INCOME OR ASSETS OR BOTH. The judgment debtor also has the right to seek a declaration at an earlier date, by notifying the clerk in writing at the office of the Clerk of Circuit Court in room 601, 50 W. Washington St., Chicago, IL 60602. When so notified, the Clerk of the Circuit Court will obtain a prompt hearing date from the court and will provide a hearing date and the necessary forms that must be prepared by the judgment debtor or the attorney for the judgment debtor and sent to the judgment creditor or the judgment creditor's attorney by regular first class mail, regarding the time and location of the hearing.

This notice may sent to the judgment debtor by regular first class mail.

CERTIFICATION OF MAILING BY ATTORNEY FOR JUDGMENT CREDITOR

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), the undersigned certifies that s/he mailed by regular first-class mail a copy of the citation notice and this citation to defendant at the address shown below upon filing of the citation or within three business days of service if served upon Third Party Respondent.

Signature: _____

Name: Michael R. Joyce
Keith S Shindler
Anthony Frank

27053

The Shindler Law Firm
 Attorney for Plaintiff
 1990 E. Algonquin Rd. Ste. 180
 Schaumburg, IL 60173
 Telephone: (847) 537-1000
 FAX: (847) 241-1220

 Preparer's Signature

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Human Resources Division
Medical Services Section

24 December 2010

TO: Tracey R. Ladner
Director
Human Resources Division

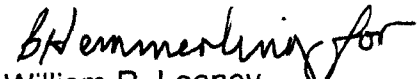
FROM: William R. Looney
Inspector/Commanding Officer
Medical Services Section

SUBJECT: Reinstatement Process, Medical Clearance:

Sams, Jeanette Y.
LOA: 14 Jul 2006

Rank: Police Officer
Employee #: 30860
Star #: N/A

Pursuant to your request, the above-named Officer was provided with a physical examination on 15 Nov 10 based on her application for Reinstatement from a Leave of Absence-Personal Disability. The medical evaluation disclosed that the Officer is qualified to return to Convalescent Duty status. However, the Officer's eligibility status has not been verified by the Internal Affairs Division or the Human Resources Division. Furthermore, Range Qualification has not been scheduled by the Medical Services Section.


William R. Looney
Inspector/Commanding Officer
Medical Services Section

CC: Howard W. Lodding
Assistant Deputy Superintendent
Education and Training Division

Virginia Garcia
Manager of Police Personnel

John J. Gallagher, Jr.
Executive Director
Policeman's Annuity and Benefit Fund

RECEIVED

DEC 29 2010

HUMAN RESOURCES DIVISION
EMPLOYMENT SERVICES



Chicago Police Department
 Medical Services Section
 3510 S. Michigan Avenue
 Chicago, IL, 60653

Date: 7/23/10

Attn Nurse: Beverly Holowach
 Contact Number: 312 745-5114
 Fax Number: 312-745-6707

Dear Doctor,

The below listed Chicago Police Officer is currently under your care for a sickness or injury.

Officer	JEANNETTE SAMS	Employee#
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The Chicago Police Department promotes a timely return to duty and can accommodate an Officer with certain medical limitations. A Chicago Police Officer can return to work when the Officer can meet both of the following criteria:

- The Officer can safely carry, handle and use his/her Department approved prescribed firearm (pending a successful completion of a Department qualification course, if applicable).
- Maintain an independent and stable gait without the assistance of external ambulatory support devices (e.g., crutches, canes, walkers, wheelchairs etc.). Subject to evaluation by the MSS an officer wearing prosthesis or other orthopedic devices (braces, open toe walking shoe etc.) may be granted an assignment as appropriate.

Based on your current evaluation of the Officer

- This Officer meets the above criteria and return to full duty. ☐ Yes ☐ No
- This Officer meets the above criteria but has medical limitations. ☒ Yes ☐ No

Projected duration of medical limitation(s) _____
 Please list the medical limitation(s) that may require this Officer to work in a limited duty capacity:

Sedentary position appropriate with intermittent standing walking as needed. Officer is able to maintain steady gait without cane assistance and is able to maintain full time position

This Officer cannot meet the above criteria at this time and cannot return to any type of duty. ☐ Yes ☐ No

Projected duration of this No-Work status _____
 Please list the reason(s) the Officer cannot return to duty at this time:

CHRISTIAN COMMUNITY
HEALTH CENTER
 9718 South Halsted Street
 Chicago, IL 60628
 773-233-4100
 773-233-8542 Fax

Deborah Killingsworth, M.D.

M.D. Signature

Date:

Deborah Killingsworth MD
 Deborah Killingsworth, M.D. 7/23/10

DEC 08 2010



ADVANCED OCCUPATIONAL MEDICINE SPECIALISTS

November 15, 2010

Chicago Police Department
Medical Services
Attn: Beverly Holowach, R.N.
3570 South Michigan Avenue
Chicago, IL 60653

Re: Jeanette Sams

Dear Ms. Holowach:

We performed a Reinstatement physical examination of Jeanette Sams (8/15/1958) on November 15, 2010. The results of the medical examination have been reviewed. The examination included:

- Physical Examination by a Physician
- Health History
- Body Fat Composition
- Chemistry Screen Panel
- Serum HCG
- Rubella Screen
- Urinalysis
- Complete Vision Testing
- Tonometry Testing
- Chest X-ray-PA & Lateral
- Pulmonary Function Testing
- Audiogram
- 12-lead Electrocardiogram

Some results of the examination, on the date tested above, were outside normal limits in the following areas:

Ms. Sams' spirometry reveals a moderate restrictive pattern. Full pulmonary function tests are recommended. An exercise stress test was not performed in my office. Ms. Sams is only able to undergo pharmacological stress tests. Her last documented adenosine stress test and myocardial perfusion study, dated 7/14/2009, is a normal study. Ms. Sams is found to have a significantly elevated serum LDL and total cholesterol. She has a slightly elevated serum LDH. She has immunity to Hepatitis B and Rubella. The Hepatitis C antibody is nonreactive. She has bloodtype O positive.

These deviations from normal limits do not relate to conditions that might place Ms. Sams at a health or safety risk associated with her employment. Ms. Sams may work full duty, but she should review these results with her physician or with our providers.

Sincerely,

Fernando Manalac, M.D.

Bellwood Clinic: 2615 W. Harrison • Bellwood, IL 60104 • 708-493-0299 • Fax: 708-493-0594
Chicago Clinic: 614 W. Monroe • Chicago, IL 60661 • 312-258-0700 • Fax: 312-258-0705
O'Hare Clinic: 4200 N. Mannheim • Schiller Park, IL 60176 • 847-801-5170 • Fax: 847-801-5176

DEC 08 2010

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1424



CHRISTIAN
COMMUNITY
HEALTH
CENTER

Date: 2/22/11

CERTIFICATE TO RETURN TO WORK/SCHOOL

Name: Jeanette Sams

Was seen in my office on 2/22/11

Was under my care from _____ to _____

Will be able to return to work/school on 2/28/11

Restrictions _____ Light Work _____

Comments Pt may return to work & restrictions
as previously recommended

Diagnosis: Headaches & fall injury

Follow-Up Visit Date: 4 weeks Time: per scheduling

Dr. KILLINGSWORTH Signature: Deborah Killingsworth



CHRISTIAN COMMUNITY
HEALTH CENTER
9718 South Halsted Street
Chicago, IL 60628
773-233-4100
773-233-8542 Fax
Deborah Killingsworth, M.D.